

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: LOWER MANHATTAN DISASTER SITE	:	21 MC 102 (AKH)
LITIGATION	:	
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CLARA DOTA,	:	07-CV-1602 (AKH)
	:	
Plaintiff,	:	
	:	
-against-	:	

120 BROADWAY CONDOMINIUM (CONDO	:	
#871), 120 BROADWAY HOLDING, LLC, 120	:	
BROADWAY PROPERTIES, LLC, 120	:	
BROADWAY, LLC, 715 REALTY CORP., 90	:	
CHURCH STREET LIMITED PARTNERSHIP, AJ	:	
GOLDSTEIN & CO., ALAN KASMAN D/B/A/	:	
KASCO, ALAN L. MERRIL, AMBIENT GROUP,	:	
INC., ANN TAYLOR STORES CORPORATION,	:	
BANKERS TRUST COMPANY, BATTERY PARK	:	
CITY AUTHORITY, BELFOR USA GROUP, INC.,	:	
BETTY JEAN GRANQUIST, BLACKMON-	:	
MOORING-STEAMATIC CATASTOPHE, INC.	:	
D/B/A BMS CAT, BOARD OF EDUCATION OF	:	
THE CITY OF NEW YORK, BOARD OF	:	
MANAGERS OF THE 120 BROADWAY	:	
CONDOMINIUM (CONDO #871), BOSTON	:	
PROPERTIES, INC., BROOKFIELD FINANCIAL	:	
PROPERTIES, INC., BROOKFIELD FINANCIAL	:	
PROPERTIES, LP, BROOKFIELD PARTNERS,	:	
LP, BROOKFIELD PROPERTIES	:	
CORPORATION, BROOKFIELD PROPERTIES	:	
HOLDINGS INC., BT PRIVATE CLIENTS CORP.,	:	
CAROL GAYNOR TRUST, CAROL GAYNOR, AS	:	
TRUSTEE OF THE CAROL GAYNOR TRUST,	:	
CAROL MERRIL GAYNOR, CITI BANK, NA,	:	
DEPARTMENT OF BUSINESS SERVICES,	:	
DEUTSCHE BANK TRUST COMPANY,	:	

**FGP 90 WEST STREET,
INC.'S NOTICE OF
ADOPTION OF ANSWER TO
MASTER COMPLAINT**

DEUTSCHE BANK TRUST COMPANY :
 AMERICAS, DEUTSCHE BANK TRUST :
 CORPORATION, ENVIROTECH CLEAN AIR, :
 INC., FGP 90 WEST STREET INC., FRED :
 GOLDSTEIN, GPS ENVIRONMENTAL :
 CONSULTANTS, INC., HARLAND GAYNOR, AS :
 TRUSTEE UNDER A DECLARATION OF :
 TRUST, HAROLD G. GOLDSTEIN, AS TRUSTEE :
 UNDER A DECLARATION OF TRUST, HERMAN :
 L. BLUM, AS TRUSTEE UNDER THE LAST :
 WILL AND TESTAMENT OF LOUIS W. :
 GOLDSTEIN, HILLMAN ENVIRONMENTAL :
 GROUP, LLC., IDELL GOLDSTEIN, AS :
 TRUSTEE UNDER DECLARATION OF TRUST, :
 INDOOR ENVIRONMENTAL TECHNOLOGY, :
 INC., KASCO RESTORATION SERVICES CO., :
 KIBEL COMPANIES, MARGARET G. WATERS, :
 MARGUERITE K. LEWIS, AS TRUSTEE UNDER :
 THE LAST WILL AND TESTAMENT OF LOUIS :
 W. GOLDSTEIN, MATTHEW A. GELBIN, AS :
 TRUSTEE OF THE GELBIN FAMILY, MERRILL :
 LYNCH & CO. INC., NATALIE S. LEBOW, AS :
 TRUSTEE OF THE JEREMIAH PHILIP LEBOW :
 REVOCABLE TRUST, NATALIE S. LEBOW, AS :
 TRUSTEE OF THE JERRY P. LEBOW FAMILY :
 TRUST, NEW YORK CITY SCHOOL :
 CONSTRUCTION AUTHORITY, NOMURA :
 HOLDING AMERICA, INC., NOMURA :
 SECURITIES INTERNATIONAL, INC., ONE :
 WALL STREET HOLDINGS, LLC., PAMELA :
 BETH KLEIN, AS TRUSTEE OF THE PAMELA :
 AND ROWEN KLEIN TRUST, ROWAN K. :
 KLEIN, AS TRUSTEE OF THE PAMELA AND :
 ROWAN KLEIN TRUST, RUTH G. LEBOW, :
 SHIRLEY G. SHOCKLEY, AS TRUSTEE UNDER :
 DECLARATION OF TRUST, SILVERSTEIN :
 PROPERTIES, INC., STRUCTURE TONE (UK), ;
 INC., STRUCTURE TONE GLOBAL SERVICES, :
 INC., SYLVIA R. GOLDSTEIN, THE BANK OF :
 NEW YORK COMPANY, INC., THE BANK OF :
 NEW YORK TRUST COMPANY NA, TISHMAN :
 INTERIORS CORPORATION, TISHMAN :
 SPEYER PROPERTIES, TOSCORP INC., :
 TRIBECA LANDING L.L.C., TUCKER :
 ANTHONY, INC., :
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TULLY CONSTRUCTION CO., INC., TULLY :
 INDUSTRIES, INC, V CUCINIELLO, VERIZON :
 NEW YORK, INC, WESTON SOLUTIONS, INC., :
 WFP TOWER A CO., WFP TOWER A CO. G.P. :
 CORP., WFP TOWER A. CO., L.P., WFP TOWER :
 B CO. G.P. CORP., WFP TOWER B HOLDING :
 CO., LP, WFP TOWER B. CO., L.P., WFP TOWER :
 D CO. G.P. CORP., WFP TOWER D HOLDING :
 CO. I L.P., WFP TOWER D HOLDING CO. II L.P., :
 WFP TOWER D HOLDING I G.P. CORP., and :
 WFP TOWER D. CO., L.P., ET AL :
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 Defendants :
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PLEASE TAKE NOTICE THAT Defendant FGP 90 West Street, Inc., by its attorneys, DLA Piper US LLP, as and for its responses to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts FGP 90 West Street, Inc.'s Answer to Master Complaint dated August 3, 2007, which was filed in the matter *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). To the extent that FGP 90 West Street, Inc.'s Answer to the Master Complaint does not comprehensively address any of the allegations set forth in the Check-Off Complaint filed in the above-captioned matter, FGP 90 West Street, Inc. denies knowledge or information sufficient to form a belief as to the truth of such allegations.

WHEREFORE, FGP 90 West Street, Inc. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York.
February 4, 2008

By: s/ Keara M. Gordon
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